

### **REMARKS**

This Amendment is fully responsive to the non-final Office Action dated September 24, 2008, issued in connection with the above-identified application. Claims 1-15 are pending in the present application. With this Amendment, claims 1, 3, 4, 6-9, 12, 14 and 15 have been amended. No new matter has been introduced by the amendments made to the claims. Favorable reconsideration is respectfully requested.

To facilitate the Examiner's reconsideration of the present application, the Applicants have provided amendments to the specification and the abstract. The changes to the specification and the abstract include minor editorial and clarifying changes. Replacement paragraphs and a new abstract are enclosed. No new matter has been introduced by the amendments made to the specification and the abstract.

In the Office Action, claim 7 is objected to as being depended upon a rejected base claim. However, the Examiner also indicates that claim 7 would be allowable if rewritten in independent form to include all the limitations of the base claim and any intervening claims. The Applicants assert that the amendments and arguments provided herein are believed to be sufficient to overcome the rejection to independent claim 1, from which claim 7 depends. Accordingly, withdrawal of the objection to claim 7 is respectfully requested.

In the Office Action, the specification is objected to because of minor informalities. Specifically, the Examiner objects to the abstract for exceeding 150 words and for including legal phraseology that is typically found in the claims. As noted above, a new abstract has been provided that is less than 150 words and does not include legal phraseology. Withdrawal of the objection to the specification is respectfully requested.

In the Office Action, claim 14 is objected to for failing to include actual steps. The Applicants have amended claim 14 to more clearly recite a method of adjusting that includes an adjusting step. Withdrawal of the objection to claim 14 is respectfully requested.

In the Office Action, claim 15 has been rejected under 35 U.S.C. 101 for allegedly being directed to non-statutory subject matter. Specifically, the Examiner alleges that claim 15 is directed to a computer program *per se*, which is non-statutory functional descriptive material. Claim 15 has been amended to indicate that the program is "stored on a computer-readable

medium.” As amended, the functionality of the program in claim 15 can be fully realized, and the claim is now believed to be directed to statutory subject matter. Withdrawal of the rejection under 35 U.S.C. 101 is respectfully requested.

In the Office Action, claims 1-15 have been provisionally rejected on grounds of non-statutory obviousness-type double patenting as being unpatentable over claims 1-25 of Application No. 11/115,152 (hereafter “152 application”). In response to this rejection, the Applicants have provided herein a terminal disclaimer. Accordingly, withdrawal of the rejection on grounds of non-statutory obviousness-type double patenting in view of the 152 application is respectfully requested.

In the Office Action, claims 1, 2 and 9-15 have been rejected under 35 U.S.C. 102(e) as being anticipated by Sakai et al. (U.S. Publication No. 2005/0078184, hereafter “Sakai”). The Applicants have amended independent claims 1, 12 and 14 in order to help further distinguish the present invention from the cited prior art. Claim 1, as amended, recites the following features:

“[a] camera terminal constituting an imaging zone adjusting apparatus that adjusts an imaging zone using multiple camera terminals, comprising:

a camera configured to image a hypothetical imaging zone that is a hypothetical imaging zone including a sum of imaging zones obtained by changing a rotation angle of said camera or a position of said camera within a specific zone in a specific period of time;

an adjusting unit configured to adjust the position of the hypothetical imaging zone by controlling said camera; and

a communication unit configured to send and receive hypothetical imaging zone information indicating the hypothetical imaging zone,

wherein said adjusting unit is configured to adjust the position of the hypothetical imaging zone to which the camera terminal belongs based on the hypothetical imaging zone to which the camera terminal belongs provided with said adjusting unit and hypothetical imaging zones of the other camera terminals indicated by the hypothetical imaging zone information received by said communication unit so that a combined zone of the hypothetical imaging zones of said multiple camera terminals completely covers a specific imaging target zone.” (Emphasis

added).

The features emphasized above in independent claim 1 are similarly recited in independent claims 12 and 14. Additionally, the features emphasized above are fully supported by the Applicants' disclosure (see e.g., ¶ [0034]; ¶ [0051]; and pg. 33, lines 1-10).

The present invention, as recited in independent claims 1, 12 and 14, is distinguishable over the cited prior art in that the present invention constantly monitors an imaging target zone with no blind spots and detects a target within the zone, in addition to obtaining detailed information on the detection target. For this reason, a hypothetical imaging zone is defined which is a sum of imaging zones imaged by respective camera terminals in a specific period of time. A position of the camera terminal is adjusted using the hypothetical imaging zone of the camera terminal and the hypothetical imaging zones of other camera terminals.

In the Office Action, the Examiner relies on Sakai for disclosing all the features of independent claims 1, 12 and 14. However, the Applicants assert that Sakai fails to disclose or suggest the features recited in claims 1, 12 and 14, as amended.

Sakai discloses changing the angle of posture of a camera depending on the number of persons detected in an image capturing region (see e.g., ¶ [0049] to ¶ [0057]). The objective of Sakai is to capture images in a region occupied by persons from various angles and in more detail. On the other hand, as noted above, the objective of the present invention is to constantly monitor an imaging target zone with no blind spots and to detect a target within the zone; in addition to obtaining detailed information on the detection target. Unlike the present invention, Sakai does not disclose or suggest imaging the imaging target zone with no blind spots by defining the hypothetical imaging zone in a specific period of time. Thus, Sakai does not disclose all the features of the present invention (as recited in claims 1, 12 and 14, as amended).

Accordingly, independent claims 1, 12 and 14 are not anticipated or rendered obvious by Sakai. Likewise, claims 2, 9-11, 13 and 15 are not anticipated or rendered obvious by Sakai at least by virtue of their respective dependency from independent claims 1, 12 and 14. In the Office Action, no prior art rejections were made to claims 3-6 and 8.

In light of the above, the Applicants respectfully submit that all the pending claims are patentable over the prior art of record. The Applicants respectfully request that the Examiner withdraw the rejections presented in the outstanding Office Action, and pass the present application to issue.

Respectfully submitted,

Katsuji AOKI et al.

/Mark D. Pratt/

By: 2008.12.16 12:43:02 -05'00'

Mark D. Pratt  
Registration No. 45794  
Attorney for Applicants

MDP/ats  
Washington, D.C. 20006-1021  
Telephone (202) 721-8200  
Facsimile (202) 721-8250  
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